

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF DELAWARE**

IN THE MATTER OF THE APPLICATION)	
OF DELMARVA POWER AND LIGHT)	
COMPANY FOR APPROVAL OF THE 2017)	PSC DOCKET NO. 17-0154
PROGRAM FOR THE PROCUREMENT OF)	
SOLAR RENEWABLE ENERGY CREDITS)	
(FILED MARCH 24, 2017))	

**PETITION OF THE DEPARTMENT OF NATURAL RESOURCES
AND ENVIRONMENTAL CONTROL FOR LEAVE TO INTERVENE**

Pursuant to Rule 21 of the Rules of Practice and Procedure of the Delaware Public Service Commission, the State of Delaware Department of Natural Resources and Environmental Control (“DNREC”) hereby petitions the Commission for leave to intervene as a party in this matter.

In support of its petition for leave to intervene, DNREC states the following:

1. On March 24, 2017, Delmarva Power & Light Company filed an application with the Commission seeking approval of its proposed procurement program for the year 2017 to acquire Solar Renewable Energy Credits (“SRECs”). The Commission set April 14, 2017, as the deadline for filing petitions to intervene.

2. DNREC is an agency of the State of Delaware, created pursuant to 29 *Del. C.* § 8001, *et seq.* DNREC’s mission “is to ensure the wise management, conservation, and enhancement of the State’s natural resources, protect public health and the environment, provide quality outdoor recreation, improve the quality of life and educate the public on historic, cultural, and natural resource use, requirements and issues.”

3. DNREC's contact information, pursuant to Rule 21(i) of the Commission's Rules of Practice and Procedure, is as follows:

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4. Delmarva Power's application seeks approval of its 2017 Program for the Procurement of Solar Renewable Energy Credits. The docket involves policy issues of interest to DNREC, Division of Energy & Climate.

5. DNREC's interests in the outcome of this proceeding are in ensuring and supporting the implementation of a stable and sustainable market for Solar Renewable Energy Credits, which will meet the requirements and policy objectives of the Renewable Energy Portfolio Standards Act (26 *Del. C.* § 351 *et seq.*). Furthermore, DNREC, Division of Energy & Climate, provides staff support to the Renewable Energy Taskforce, and the Division's Acting Director chairs the Taskforce. The Renewable Energy Taskforce developed the 2017 Program for the Procurement of Solar Renewable Energy Credits presented in this docket.

6. DNREC's interest will not be adequately represented by any of the other parties to this proceeding. Furthermore, DNREC, Division of Energy & Climate, has statutory responsibility for the management and development of renewable energy markets in Delaware.

In that respect, no other participant in this proceeding has the same obligation to promote renewable energy in Delaware as DNREC.

7. DNREC's participation in the proceeding will be in the public interest. The public relies upon DNREC, Division of Energy & Climate, to provide guidance and expertise in developing and managing renewable energy markets in Delaware. DNREC has intervened in similar dockets in 2011 (Docket No. 11-399), 2012 (Docket No. 12-526), 2014 (Docket No. 14-41 and Docket No. 14-0560), and 2015 (Docket No. 15-1472).

8. For the foregoing reasons, DNREC respectfully requests that it be granted leave to intervene in this proceeding as a party for all purposes.

Respectfully submitted,

/s/ William J. Kassab

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Attorney for the Department of Natural
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Dated: April 12, 2017

CERTIFICATE OF SERVICE

I certify that on April 12, 2017, I filed the attached *Petition for Leave to Intervene of the Department of Natural Resources and Environmental Control* with the Public Service Commission.

**STATE OF DELAWARE
DEPARTMENT OF JUSTICE**

/s/ William J. Kassab

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